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AUTOMOTIVE GROUP, INC., DOLLAR RENT A
CAR, INC. and DTG OPERATIONS, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

SANDRA McKINNON and KRISTEN
TOOL, individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

DOLLAR THRIFTY AUTOMOTIVE
GROUP, INC. d/b/a DOLLAR RENT A CAR;
DOLLAR RENT A CAR, INC.; DTG
OPERATIONS, INC. d/b/a DOLLAR RENT
A CAR; and DOES 1-10, inclusive,

Defendants.

Case No. 12-cv-04457- SC

CLASS ACTION

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO PARTIALLY MODIFY
BRIEFING SCHEDULE ON
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

Current Hearing Date: May 15, 2015

Time: 10:00 a.m.

Judge: Hon. Samuel Conti

Courtroom: 1

[Complaint Filed: August 24, 2012]

1 Pursuant to Fed. R. Civ. P. 15(b)(4), Fed. R. Civ. P. 16(b)(4), and Civil L.R. 7-12, 6-1(b)
2 and 6-2, and the Supporting Declaration of John F. Ward, Jr., it is hereby stipulated by and
3 between Plaintiffs and Defendants (together the “Parties”), through their respective counsel, as
4 follows:

5 WHEREAS, on January 21, 2015, the Court adopted the Parties’ Stipulation and entered
6 an Order revising the briefing and hearing schedule for Plaintiffs’ Motion for Class Certification
7 (ECF No. 99), with Defendants’ Opposition papers due by March 6, 2015, Plaintiffs’ Reply papers
8 due by April 10, 2015, with the Motion hearing date scheduled for Friday, May 15, 2015;

9 WHEREAS, Plaintiffs’ counsel have brought a parallel case against Defendants, *Friedman*
10 *v. Dollar*, No. 12-cv-2432-WYD-KMT (D. Colo.), in which the court has ordered expedited
11 briefing over the next several weeks, with Defendants’ opposition to class certification due March
12 18, 2015 and plaintiffs’ reply brief due April 6, 2015;

13 WHEREAS, the Parties wish to avoid scheduling conflicts between this case and the
14 *Friedman* case;

15 WHEREAS, the Parties wish to coordinate overlapping depositions between this case and
16 the *Friedman* case, and the Parties wish to depose certain witnesses before the current briefing
17 deadlines in both cases;

18 WHEREAS, some of the witnesses whom the Parties wish to depose will not be available
19 sufficiently in advance of the current briefing deadlines.

20 The grounds for this stipulation are set forth in the accompanying Declaration of John F.
21 Ward, Jr.

22 NOW, THEREFORE, the parties stipulate as follows:

23 1. That the Court continue the deadlines for the Opposition and Reply papers as
24 follows: Defendants’ Opposition papers due April 3, 2015; Plaintiffs’ Reply papers due May 1,
25 2015.

26 2. That the Court continue the Motion hearing date to June 5, 2015 or a later mutually
27 available date that the Court is available.
28

1
2 Dated: February 20, 2015

JENNER & BLOCK LLP

3 By: /s/ John F. Ward, Jr.

4 JOHN F. WARD, JR.

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16 Attorneys for Defendants

DOLLAR THRIFTY AUTOMOTIVE GROUP,

17 INC., DOLLAR RENT A CAR, INC. and DTG

OPERATIONS, INC.

18 Dated: February 20, 2015

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Attorneys for Plaintiffs SANDRA McKINNON and
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Filer's Attestation: Pursuant to L.R. 5-1(i)(3), John F. Ward, Jr. hereby attests that concurrence in the filing of this document has been obtained from all signatories.

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that:

1. The deadline for Defendants to file their Opposition to class certification is continued to April 3, 2015, and the deadline for Plaintiffs to file their Reply is continued to May 1, 2015.

2. The date for the hearing on the Motion for Class Certification is continued to ~~June 5, 2015~~ June 12, 2015.

Dated: February 23 2015

